

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JULIANA VELAZQUEZ

Plaintiff,

-against-

CITY OF NEW YORK, RAYMOND KELLY
COMMISSIONER OF NEW YORK CITY POLICE
DEPARTMENT, LT. THOMAS HARTIGAN AND
SGT. CHARLES ROMERO sued in their individual
and professional capacities

Defendants.

**DEFENDANTS' INITIAL
DISCLOSURES
PURSUANT TO RULE 26
(A)(1) OF THE FEDERAL
RULES OF CIVIL
PROCEDURE**

08 CV 2159 (BSJ)(GWG)

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Defendants CITY OF NEW YORK, RAYMOND KELLY COMMISSIONER OF NEW
YORK CITY POLICE DEPARTMENT, LT. THOMAS HARTIGAN and SGT. CHARLES
ROMERO, by its attorney, Michael A. Cardozo, Corporation Counsel of the City of New York,
provide plaintiff with initial disclosures pursuant to Federal Rule of Civil Procedures 26(a)(1) as
follows:

Initial Disclosure - Rule 26 (a)(1)(A):

(A) the name and, if known, the address and telephone number of each individual
likely to have discoverable information that the disclosing party may use to support its claims or
defenses, unless solely for impeachment, identifying the subjects of the information;

Response to Initial Disclosure under Rule 26 (a)(1)(A):

The following individuals may have discoverable information which defendant
may use to support the defenses in this action:

Juliana Velazquez, Lt. Thomas Hartigan and Sgt. Charles Romero

Initial Disclosure - Rule 26 (a)(1)(B):

(B) a copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment;

Response to Initial Disclosure under Rule 26 (a)(1)(B):

Defendants will be producing plaintiff's Command Personnel File, Internal Affairs Bureau ("IAB") records, Central Personnel Index, EEOC/OEEO records from the New York City Police Department, and other documents which may, or may not, be used by defendant to support the defenses in this action. Defendants reserve the right to amend production under Rule 26 (a)(1)(B).

Initial Disclosure - Rule 26 (a)(1)(C):

(C) a computation of any category of damages claimed by the disclosing parties, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered;

Response to Initial Disclosure under Rule 26 (a)(1)(C):

This initial disclosure is not applicable to the defendants.

Initial Disclosure - Rule 26 (a)(1)(D):


(D) for inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment;

Response to Initial Disclosure under Rule 26 (a)(1)(D):

This initial disclosure is not applicable to the defendant as the City of New York is self insured .

Dated: New York, New York
July 8, 2008

MICHAEL A. CARDOZO
Corporation Counsel of the
City of New York
Attorney for Defendant
100 Church Street, Room 2-107
New York, New York 10007
(212) 788-8703

By: 
Donna A. Canfield (DC2430)
Assistant Corporation Counsel
dcanfield@law.nyc.gov

To: CRONIN & BYCZEK, LLP
Attorney(s) for Plaintiff
1983 Marcus Avenue
Suite C-120
Lake Success, New York 11042
Att: Linda Cronin

CERTIFICATE OF SERVICE

I, Donna A. Canfield, hereby certify that on this date, I caused a copy of the foregoing Defendant's Initial Disclosure Pursuant To Rule 26(A)(1) Of The Federal Rules Of Civil Procedure to be served upon plaintiff by placing a copy in a pre-addressed, stamped envelope directed to:

CRONIN & BYCZEK, LLP
Attorney(s) for Plaintiff
1983 Marcus Avenue
Suite C-120
Lake Success, New York 11042
Att: Linda Cronin

that being the address designated by plaintiff for such service, and placing that envelope in a depository under the exclusive care and control of the United States Postal Service.

Dated: New York, New York
July 8, 2008

A handwritten signature in black ink, appearing to read 'Donna A. Canfield', written over a horizontal line.

Donna A. Canfield (DC2430)
Assistant Corporation Counsel

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MICHAEL A. CARDOZO

Corporation Counsel of the City of New York
Attorney for Defendants
100 Church Street, Room 2-107
New York, New York 10007-2601

Of Counsel: Donna A. Canfield
Tel.: 212-788-8703

LM No.: 2008-007920

Service of which is hereby acknowledged:

....., N.Y. Dated:

Signed:

Print Name:

Attorney for: